

Exhibit 2

From: [Cross, David D.](#)
 To: [Josh Belinfante](#); [Bryan Tyson](#); [Jonathan Crumly](#); "Bruce Brown"; [Rashmi Ahuja](#); "[cichter@ichterdavis.com](#)"; [Kaiser, Mary](#); "[jpowers@lawyerscommittee.org](#)"; "[dbrody@lawyerscommittee.org](#)"; "[erosenberg@lawyerscommittee.org](#)"; "[kaye.burwell@fultoncountyga.gov](#)"; "[david.lowman@fultoncountyga.gov](#)"; "[cheryl.ringer@fultoncountyga.gov](#)"; "[ram@lawram.com](#)"; "[hknapp@khlawfirm.com](#)"; "[sparks@khlawfirm.com](#)"; "[grant.schnell@hklaw.com](#)"; [Diane LaRoss](#); [James Balli](#); [Bryan Jacoutot](#); [Loree Anne Paradise](#); [Drina Miller](#); [Vincent Russo](#); [Alexander Denton](#); [Carey Miller](#); [Kim Bunch](#); [Manoso, Robert W.](#); [Conaway, Jenna B.](#); [Hedgecock, Lyle F.](#); [Miriylala, Arvind S.](#)
 Subject: RE: Curling - RPDs to Curling Plaintiffs
 Date: Monday, August 24, 2020 12:51:13 PM

I don't understand your response. The discovery process applies to any discovery dispute. I don't know what distinction you're trying to draw. A unilateral filing today only one business day after serving the requests and without even a telephonic meet and confer would violate her orders. There also is no ripe dispute for her to adjudicate since I explained we're not objecting to any expedited discovery at all. We need to determine an appropriate scope, as we did with you — which took weeks and two court conferences.

Obviously our position that expedited discovery is needed concerned the discovery we determined is needed for ourselves, which obviously isn't from our clients since parties don't take discovery from themselves. So I don't get your point. Had you cooperated with us, we could have negotiated mutual expedited discovery weeks ago. In any event, again, I said we're trying to determine what's feasible. We're entitled to more than one business day to do that.

I don't understand what your last sentence means. Proceed how, with what, when?

I won't be able to respond further before 2 or 3 pm. If you proceed with an improper filing today, we'll seek relief, including for wasted fees and costs. Please include our correspondence with any filing if you persist.

From: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>
Date: Monday, Aug 24, 2020, 12:38 PM
To: Cross, David D. <DCross@mofo.com>, Bryan Tyson <btyson@taylorenghish.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, 'Bruce Brown' <bbrown@brucebrownlaw.com>, Rashmi Ahuja <rahuja@taylorenghish.com>, 'cichter@ichterdavis.com' <cichter@ichterdavis.com>, Kaiser, Mary <MKaiser@mofo.com>, 'jpowers@lawyerscommittee.org' <jpowers@lawyerscommittee.org>, 'dbrody@lawyerscommittee.org' <dbrody@lawyerscommittee.org>, 'erosenberg@lawyerscommittee.org' <erosenberg@lawyerscommittee.org>, 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>, 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>, 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>, 'ram@lawram.com' <ram@lawram.com>, 'hknapp@khlawfirm.com' <hknapp@khlawfirm.com>, 'sparks@khlawfirm.com' <sparks@khlawfirm.com>, 'grant.schnell@hklaw.com' <grant.schnell@hklaw.com>, Diane LaRoss <dlaross@taylorenghish.com>, James Balli <jballi@taylorenghish.com>, Bryan Jacoutot <bjacoutot@taylorenghish.com>, Loree Anne Paradise <lparadise@taylorenghish.com>, Drina Miller <dmiller@taylorenghish.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, Carey Miller <carey.miller@robbinsfirm.com>, Kim Bunch <Kim.Bunch@robbinsfirm.com>, Manoso, Robert W. <RManoso@mofo.com>, Conaway, Jenna B. <JConaway@mofo.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Miriyala, Arvind S. <AMiriylala@mofo.com>
Subject: RE: Curling - RPDs to Curling Plaintiffs

External Email

David:

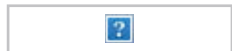
Thanks for providing some response. It is my understanding that the discovery dispute mechanism is based on discovery objections and not a motion for discovery. I seem to recall that being your interpretation as well.

Clearly you believe expedited discovery is necessary and convinced the Court of the same, but you

apparently believe that it only works for the benefit of Plaintiffs.

We will proceed.

Best regards,
JB



Josh Belinfante

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From: Cross, David D. <DCross@mofo.com>

Sent: Monday, August 24, 2020 12:29 PM

To: Josh Belinfante <Josh.Belinfante@robbsfirm.com>; Bryan Tyson <btyson@taylorenghish.com>; Jonathan Crumly <jcrumly@taylorenghish.com>; 'Bruce Brown' <bbrown@brucepbrownlaw.com>; Rashmi Ahuja <rahuja@taylorenghish.com>; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; Kaiser, Mary <MKaiser@mofo.com>; 'jpowers@lawyerscommittee.org' <jpowers@lawyerscommittee.org>; 'dbrody@lawyerscommittee.org' <dbrody@lawyerscommittee.org>; 'erosenberg@lawyerscommittee.org' <erosenberg@lawyerscommittee.org>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'ram@lawram.com' <ram@lawram.com>; 'hknapp@khlawfirm.com' <hknapp@khlawfirm.com>; 'sparks@khlawfirm.com' <sparks@khlawfirm.com>; 'grant.schnell@hklaw.com' <grant.schnell@hklaw.com>; Diane LaRoss <dlaross@taylorenghish.com>; James Balli <jballi@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Drina Miller <dmiller@taylorenghish.com>; Vincent Russo <vrusso@robbsfirm.com>; Alexander Denton <Alexander.Denton@robbsfirm.com>; Carey Miller <carey.miller@robbsfirm.com>; Kim Bunch <Kim.Bunch@robbsfirm.com>; Manoso, Robert W. <RManoso@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>

Subject: RE: Curling - RPDs to Curling Plaintiffs

Josh -

You served these Friday afternoon. I'm tied up until 2 pm today and we obviously have to discuss these with our clients. I note that it's hard to understand why you're seeking expedited discovery after arguing for weeks that none is necessary or appropriate, and you waited weeks to serve these. They're also far broader than we sought,

eg many requests seeking all documents related to many broad topics. It would help advance the ball if you were to serve much narrower, more targeted requests as we did and as the Court authorized. We need to determine what's feasible at this late juncture to begin discovery anew from our clients on an expedited basis, which we weren't expecting before Friday. We'll be in touch once we've had an opportunity to do that. We won't waste anyone's time with multiple rounds of sweeping, wholesale objections or refusals to cooperate.

Regarding your threat to go to court at 3, there's a discovery process that must be followed, as the court reiterated and we followed last week. If you refuse to comply with that process, that of course is up to you but we object to proceeding in that manner.

Thanks.
DC

From: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>

Date: Monday, Aug 24, 2020, 12:06 PM

To: Bryan Tyson <btyson@taylorenghish.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, 'Bruce Brown' <bbrown@brucebrownlaw.com>, Rashmi Ahuja <rahuja@taylorenghish.com>, 'cichter@ichterdavis.com' <cichter@ichterdavis.com>, Kaiser, Mary <MKaiser@mofo.com>, 'jpowers@lawyerscommittee.org' <jpowers@lawyerscommittee.org>, 'dbrody@lawyerscommittee.org' <dbrody@lawyerscommittee.org>, 'erosenberg@lawyerscommittee.org' <erosenberg@lawyerscommittee.org>, 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>, 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>, 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>, 'ram@lawram.com' <ram@lawram.com>, 'hknapp@khlawfirm.com' <hknapp@khlawfirm.com>, 'sparks@khlawfirm.com' <sparks@khlawfirm.com>, 'grant.schnell@hklaw.com' <grant.schnell@hklaw.com>, Diane LaRoss <dlaross@taylorenghish.com>, James Balli <jballi@taylorenghish.com>, Bryan Jacoutot <bjacoutot@taylorenghish.com>, Loree Anne Paradise <lparadise@taylorenghish.com>, Drina Miller <dmiller@taylorenghish.com>, Vincent Russo <vrusso@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, Carey Miller <carey.miller@robbinsfirm.com>, Kim Bunch <Kim.Bunch@robbinsfirm.com>, Cross, David D. <DCross@mofo.com>, Manoso, Robert W. <RManoso@mofo.com>, Conaway, Jenna B. <JConaway@mofo.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>

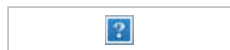
Subject: RE: Curling - RPDs to Curling Plaintiffs

External Email

Good afternoon.

Please let us know your response; otherwise, we will seek the Court's intervention at 3pm.

Thanks,
JB



Josh Belinfante

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From: Bryan Tyson <btyson@taylorenglish.com>

Sent: Monday, August 24, 2020 10:26 AM

To: Jonathan Crumly <jcrumly@taylorenglish.com>; 'Bruce Brown' <bbrown@brucebrownlaw.com>; Rashmi Ahuja <rahuja@taylorenglish.com>; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; Kaiser, Mary <MKaiser@mofo.com>; 'jpowers@lawyerscommittee.org' <jpowers@lawyerscommittee.org>; 'dbrody@lawyerscommittee.org' <dbrody@lawyerscommittee.org>; 'erosenberg@lawyerscommittee.org' <erosenberg@lawyerscommittee.org>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'ram@lawram.com' <ram@lawram.com>; 'hknapp@khlawfirm.com' <hknapp@khlawfirm.com>; 'sparks@khlawfirm.com' <sparks@khlawfirm.com>; 'grant.schnell@hklaw.com' <grant.schnell@hklaw.com>; Diane LaRoss <dlaross@taylorenglish.com>; James Balli <jballi@taylorenglish.com>; Bryan Jacoutot <bjacoutot@taylorenglish.com>; Loree Anne Paradise <lparadise@taylorenglish.com>; Drina Miller <dmiller@taylorenglish.com>; Vincent Russo <vrusso@robbsfirm.com>; Alexander Denton <Alexander.Denton@robbsfirm.com>; Carey Miller <carey.miller@robbsfirm.com>; Kim Bunch <Kim.Bunch@robbsfirm.com>; Josh Belinfante <Josh.Belinfante@robbsfirm.com>; Cross, David D. <DCross@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>

Subject: RE: Curling - RPDs to Curling Plaintiffs

From External Sender

Following up on this request, will Curling Plaintiffs consent to expedited treatment of these document requests?

Thanks,

Bryan



Bryan P. Tyson

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From: Bryan Tyson

Sent: Friday, August 21, 2020 2:35 PM

To: Jonathan Crumly <jcrumly@taylorenghish.com>; 'Bruce Brown' <bbrown@brucebrownlaw.com>; Rashmi Ahuja <rahuja@taylorenghish.com>; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; Kaiser, Mary <MKaiser@mofo.com>; 'jpowers@lawyerscommittee.org' <jpowers@lawyerscommittee.org>; 'dbrody@lawyerscommittee.org' <dbrody@lawyerscommittee.org>; 'erosenberg@lawyerscommittee.org' <erosenberg@lawyerscommittee.org>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'ram@lawram.com' <ram@lawram.com>; 'hknapp@khlawfirm.com' <hknapp@khlawfirm.com>; 'sparks@khlawfirm.com' <sparks@khlawfirm.com>; 'grant.schnell@hklaw.com' <grant.schnell@hklaw.com>; Diane LaRoss <dlaross@taylorenghish.com>; James Balli <jballi@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Drina Miller <dmiller@taylorenghish.com>; 'Vincent Russo' <vrusso@robbinsfirm.com>; 'Alexander Denton' <Alexander.Denton@robbinsfirm.com>; 'Carey Miller' <carey.miller@robbinsfirm.com>; 'Kim Bunch' <Kim.Bunch@robbinsfirm.com>; 'Josh Belinfante' <Josh.Belinfante@robbinsfirm.com>; Cross, David D. <DCross@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; 'Miriyla, Arvind S.' <AMiriyla@mofo.com>

Subject: Curling - RPDs to Curling Plaintiffs

Counsel:

As we discussed on the call with the Court today, attached are our second set of requests for production to Curling Plaintiffs. Please let us know whether you will consent to the expedited treatment of these requests or whether we will need to seek the Court's intervention. We will be serving additional discovery requests for which we will not seek expedited treatment.

Thanks,

Bryan



Bryan P. Tyson

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